

# **Exhibit E**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF JEAN M. HUNT**

I, Jean M. Hunt, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated, and these statements are further made to the best of my memory of all that has transpired in my life since September 11, 2001 (over 18 years ago).

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the Pentagon when a passenger jet, hijacked and piloted by terrorists, plunged into the Pentagon and tore through much of the building, detonating destruction, mayhem and unspeakable carnage that would endure for several hours without pause. These horrific memories will now last a lifetime for survivors like myself.

4. At the time of these horrific terrorist attacks, I was a civilian in the Army, working as a Senior Program Analyst on the second floor of a newly renovated section of the Pentagon. Prior to these attacks, I had considered the Pentagon to be the safest place in the world in which to work.

5. Before the hijacked passenger jet hit the Pentagon, I arrived at work at 8:00 am. I worked in the Compensation and Entitlements Branch of the division of Resources under the Office of the Deputy Chief of Staff for Personnel (ODCSPER). I was at my desk when American Airlines Flight 77 struck the Pentagon. The force of the blast caused my telephone to fly out of my hand, and then the lights went out in the office and smoke filled the room. I recall hearing glass breaking and then the ceiling collapsed over my head. I rushed to the nearest exit with the assistance of other military personnel, and by the time that we reached the corridor, the thick smoke had reduced all visibility. I was coughing and choking as the smoke filled the air, my bladder gave way and urine ran down my leg due to my extreme flight and fear of dying. Two naval officers grabbed me on each arm and dragged me out of the burning building to the courtyard where I was advised that I could not stay because there was another plane in the air. Without their help I would never have made it out on my own. There were bruises on my arms for several days following the attack where the officers had held me tightly.

6. As I left the burning Pentagon building, I began to experience significant physical distress, including tingling and numbness across my face and my head and a tremendous headache. I also began to experience pain and tightness in my chest. Emergency medical technicians (EMT's) treated me at the scene of the destruction, and they noted that my blood pressure was dangerously high at almost 180/98. However, due to the extreme nature of the other injuries that the medical personnel were treating, they instructed me to go home and follow up with outside medical care. Sometime later that day, I lost almost complete vision in both of my eyes as my headache and the tingling and numbness across my face and my head continued. I could not touch the top of my head for weeks after, and I later learned from my doctors that I had experienced a stroke immediately following the terrorist attack on the Pentagon. When I finally arrived to my

apartment, alone and afraid of what further was going to happen, I again called the EMTs but they refused to take me to the hospital even with blood pressure out of control and pain in head. I had no way to get to the hospital on my own. The EMT's told me to stay in the house "but not alone" even though I lived alone. How horrifying that was for me.

7. Due to the terrorist attack on the Pentagon, I suffered two strokes shortly after September 11, 2001, including a stroke on September 12, 2001, and a second stroke event on November 12, 2001. One of these strokes not only caused me to lose my vision in both eyes, but it also caused hemorrhaging from my nose that required cauterization to stop the bleeding, and further hospitalization for on the spot medical care. I also experienced weakness and decreased sensation on my left side. I also suffered from dizziness and loss of balance, as well as a pins and needles sensation and numbness on the top of my head and in my left arm and hand. At this time, the numbness has travelled completely down my left side. Lastly, I began to suffer extremely frequent headaches, insomnia and nightmares following this horrific experience. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I have received following this September 11, 2001 terrorist attack.

8. Because of the terrorist attack on the Pentagon, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever. I suffered, and continue to suffer, severe emotional distress/PTSD because of the above terrorist attack. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events that I experienced. I also continue to receive treatment for my severe emotional distress. I am constantly tortured by horrific visions of 9-11 survivors suffering burns and injuries from this tragedy. I sometimes feel that I would rather have died in



this event that have to relive it in my memories day after day. These memories remain with me to this day. For some reason, every 9-11 anniversary is more difficult for me to get through than the one from each year prior. Exhibit B also includes records confirming my debilitating PTSD caused by this terrorist attack.

9. At the time of the 9-11 attacks, I was the sole provider for my family as my husband was previously disabled. My family lost its only source of income for the first several months after the 9-11 terrorist attacks. While waiting for some form of financial assistance, our house fell into foreclosure. I never intended to stop working before the age of 75, but I could not return to work following these horrific attacks due to my cognitive decline. In all, I lost ten full years of income due to these horrific attacks, and I was never able to return to work due to the disabling consequences of my strokes and my PTSD. Because of my loss of income, my increased loss of pension savings, and the extreme rise in the cost of living, I am now in a position where I could lose my home in the future, and I will likely have to rely on my children to care for me both financially and otherwise.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30<sup>th</sup> day of December 2019.

  
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Signature of Affiant    Jean M. Hunt

# **Exhibits Filed Under Seal**